EXHIBIT 24

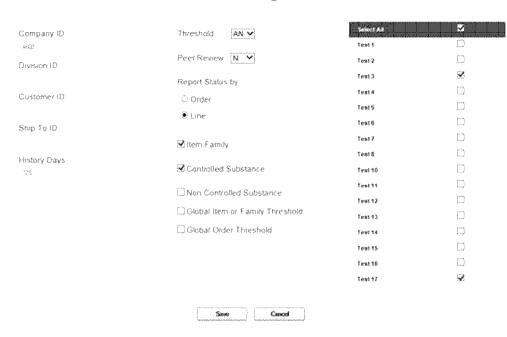| From: | Megan McAvoy </O=PUBLIX/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=PMEM> | P-PUB-0225 |
To:	David Kirkus	
Sent:	6/6/2018 10:48:33 AM	
Subject:	Current SOM Status	
Attachments:	SOMLink 17 Tests Detail.pdf	

David,

In my update meeting last week you asked for a status of how we are using E-Supply Link for SOM. Details of the 4/23 issue are outlined in the email below but here is how we are currently set up:

1. **Corporate Thresholds** are set to "AN" (as needed) meaning they are only enacted if the system doesn't have enough data (i.e. new stores) or the requested amount is high enough outside of the norm to trigger a rejection. Note, I do not have the math behind what triggers the rejection but I can confirm it does happen.
    a. *We will be turning these back to "YES" (which means they are a hard stop 100% of the time they exceed the rolling 30-day limit) on 6/15 once we have updated the family groups.*
2. We have always used **Test #3** – see details attached.
    a. Evaluates <u>Size</u> (order qty)
3. We turned on **Test 17** on 4/23
    a. Evaluates <u>pattern</u>
4. We are working on edits to test 11 to evaluate <u>frequency</u>
    a. The issue here is the way they are calculating the average (they are dividing by the days in a month and not considering the number of days they actually receive orders)

This is a screen shot from SOM that shows our corporate configuration as of today.

Edit Configuration

Megan McAvoy
Pharmacy Procurement Manager – Generic Trade | Publix Super Markets, Inc. | Lakeland, FL
(863) 688-1188 ext. 53645 | megan.mcavoy@publix.com

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

PUBLIX-MDLT8-00071320

P-01361_1

From: Megan McAvoy   P-PUB-0225
Sent: Wednesday, May 09, 2018 5:02 PM
To: Chris Hewell
Cc: Todd Sturdivant
Subject: RECAP - - E-Supply Link Notes

Chris/Todd:

Here are my notes for the SOM/E-Supply Link timeline documentation. Please add/edit as necessary and I will file in case there are future questions regarding the issue from the week of 4/23.

- · When Publix Warehouse began shipping controlled substances in October 2016, the decision was made to use an outside vendor, E-Supply Link as our Suspicious Order Monitoring System
- · There are 17 different test options available – see `SOM Link 17 Test Detail` saved here
- · Publix initially used multiple tests, however, too many orders errored out and we were unable to service our stores
  - o Chris: this is where I could really use your past knowledge
- · The Pharmacy RBU and IT were both under the assumption that the thresholds that were set by our corporate office were enacted for every store on every order as a HARD STOP if the 30-day cumulative order qty exceeded the existing threshold
- · On April 4, 2018, Megan connected with Bill Duncan via phone call and requested a phone conference to discuss updating a few of the tests so that Publix could turn more of them on for enhanced security
- · Our first meeting was scheduled for 4/10/2018. Notes from that discussion are below:
  - o Publix to review the algorithms to capture these categories:
    - § Size
    - § Frequency of orders
    - § Abnormal patterns
  - o Reconnect our discuss our recommendations either week of 4/16 or 4/23 (Megan and Todd to schedule)
  - o E-Supply Link to create utility for the RBU to:
    - § Mass Import new family group thresholds
    - § Mass update family group thresholds
- · Chris and Megan met on 4/20 to develop recommendations for E-Supply link to improve the algorithms behind these tests
  - o Main recommendation included updating how they calculate average for test 11
- · Todd, Megan and Chris met with Todd LaBonte from E-Supply link on Monday, 4/23 to provide this feedback. Here are the key points from the meeting:
  - o Publix asked e-supply link to look at the way they are calculating "average" order size – we need them to look at actual, not daily average (because we'll always be over that way)
  - o Publix decided to test Test#17
  - o During the conversation, e-supply link mentioned that the thresholds were set to "As Needed" which meant that if there was enough history, and the growth over the threshold limit was reasonable, the threshold would not be enacted – **making it so that the store could order a qty over their current threshold within that 30-day period.**
    - § This was *very concerning* to the Publix Team and not how we intended for the system to be operating
    - § Publix made the decision to switch Thresholds to "YES" from "As Needed"
  - o By Thursday, 4/26, over 5000 items did not ship from the Publix Warehouse due to threshold limitations
  - o Chris and Megan spoke to Paul Hines, David Kirkus and Toan Do with the recommendation to move thresholds back to "As Needed" temporarily to allow service to the stores, while we proactively increase some Family Group Thresholds so that when we turn them back to "YES", we are using more accurate levels.

§ Note, as of 5/9 we still have thresholds set to "AS NEEDED" until the initiative below is
completed.

§ Chris and Megan will touch base on 5/15 to develop standard threshold improvement logic.

o These are the family groups we are targeting to update:

Family Group	Sum of Total	Family Group Name	Status
69	1025	AMPHETAMINE SALTS CT	Completed
56	684	OXYCODONE IR	NO
76	427	VYVANSE CT	BRAND - wait
58	395	Methylphenidate CT	YES
57	372	OXYCOD/APAP CT	NO
91	333	LYRICA CT	BRAND - wait
65	320	Hydrocodone- CT	YES
63	283	Morphine Sulfate ER CT	YES
41	214	TRAMADOL >100ct-CT	YES
44	213	Alprazolam <500ct- CT	YES
96	213	FENTANYL PATCHES	Yes
52	212	ZOLPIDEM 100CT- CT	yes
1	209	ALPRAZOLAM->500 CT	YES
11	208	CODEINE-ML	yes
8	187	CLONAZEPAM > 500CT -CT	YES
3	166	BUPRENORPHINE-CT	YES
48	139	DIAZEPAM 100CT - CT	YES
61	132	Hydromorphone CT	NO
75	122	DEXMETHYLPHENIDATE CT	YES
59	119	HYDROCODONE ML	YES
45	117	CLONAZEPAM < 500CT -CT	YES
36	112	ZOLPIDEM-CT	YES
86	102	METHADONE CT	NO

Megan McAvoy
Pharmacy Procurement Manager - Generic Trade | Publix Super Markets, Inc. | Lakeland, FL
(863) 688-1188 ext. 53645 | megan.mcavoy@publix.com

PUBLIX-MDLT8-00071322

P-01361_3

P-PUB-0225

SOMLink Analytic Tests- Details

Test	Explanation	Causes
Test 1	One point more than 3 SD from Mean The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order is larger than 99.7% of similar orders. Failing this test indicates that this order quantity may be suspicious based on its size compared to historic order amounts. Triggering this test indicates there is a potential that this order quantity is suspicious. However, triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Increased order size due to normal business variations or order timing. • New item that may have an unusually small variation in order size. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test
Test 2	Nine points in a row above centerline The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern indicating a potentially suspicious order. This order is the ninth in a series of orders that are above the average order quantity for this product. This is an unlikely event and may indicate the customer orders are suspicious compared to past order patterns. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Customers or product may have a growing demand resulting in increasing order quantities. • Error in quantity entered in for this order may trigger this test.
Test 3	Six points in a row increasing The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern indicating an ever increasing order quantity. The last six order quantities have been increasing that may indicate a suspicious order pattern. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this error does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Customers or product may have a growing demand resulting in increasing order quantities. • Customer maybe expanding sales into new markets resulting in increased order quantities. • Error in quantity entered in for this order may trigger this test.
Test 4	Fourteen points in a row alternating up and down The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern indicating a potentially suspicious order. This order is the fourteenth in a series of orders that quantities alternate up and down. This saw tooth pattern is unlikely and may indicate the customer orders are suspicious compared to past order patterns. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Customers or product may have a growing demand resulting in increasing order quantities. • Customer may be expanding sales into new markets resulting in increased order quantities. • Customer sales may have a natural periodic swing. • Error in quantity entered in for this order may trigger this test.

PUBLIX-MDLT8-00071323

P-01361_4

P-PUB-0225

Test 5	Two of Three points greater than 2 SD from mean The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern where two of the last three orders are larger than 95.4% of similar orders. Failing this test indicates that this pattern of order quantity may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• This customer is larger relative to other customers, and orders tend to be in larger quantities. • Increasing order sizes due to normal business variations or order timing. • Item that may have an unusually small variation in order size. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test.
Test 6	Four of Five points greater than 1 SD from mean The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern where four of the last five orders are larger than 68.3% of similar orders. Failing this test indicates that this pattern of order quantity may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Increasing order sizes due to normal business variations or order timing. • Item that may have an unusually small variation in order size. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test
Test 7	Fifteen points in a row within 1 SD above mean The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern where the last fifteen orders are slightly larger than average quantity of similar orders. Failing this test indicates that this pattern of order quantity may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Item that may have an unusually small variation in order sizes. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test.
Test 8	Eight points in a row greater than 1 SD above mean The software has identified the quantity this customer is ordering as potentially suspicious. This test is based solely on the quantities ordered and does not consider the time between orders for similar products. Quantity in the most recent order completes a pattern where the last eight orders are larger than 68.3% of similar orders. Failing this test indicates that this pattern of order quantity may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order quantity is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Item that may have an unusually small variation in order size. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test.
Test 10 – Rate	One point more than 3 SD from Mean	• Increased order frequency due to normal business variations or order timing.

PUBLIX-MDLT8-00071324

P-PUB-0225

	The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The order rate in the most recent order is larger than 99.7% of similar order rates. Failing this test indicates that this order rate may be suspicious based on its size compared to historic order rates. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Item that may have an unusually small variation in order frequency. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity or dates entered in for this order may trigger this test.
Test 11	Nine points in a row above centerline The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern indicating a potentially suspicious order. This order is the ninth in a series of orders that are above the average order rate for this product. This is an unlikely event and may indicate the customer orders are suspicious compared to past order patterns. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Customers or product may have a growing demand resulting in increasing order quantities or frequency. • Error in quantity or dates entered in for this order may trigger this test
Test 12	Six points in a row increasing The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern indicating an ever increasing order rate. The last six order rates have been increasing that may indicate a suspicious order pattern. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this error does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error.	• Customers or product may have a growing demand resulting in increasing order quantities or frequency. • Customer my be expanding sales into new markets resulting in increased order quantities or frequency. • Error in quantity or date entered in for this order may trigger this test.
Test 13	Fourteen points in a row alternating up and down The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern indicating a potentially suspicious order. This order is the fourteenth in a series of orders that have rates that alternate up and down. This saw tooth pattern is unlikely and may indicate the customer orders are suspicious compared to past order patterns.	• Customers or product may have a growing demand resulting in increasing order quantities or frequencies. • Customer my be expanding sales into new markets resulting in increased order quantities or frequencies. • Error in quantity or date entered in for this order may trigger this test.

PUBLIX-MDLT8-00071325

P-PUB-0225

	Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	
Test 14	**Two of Three points greater than 2 SD from mean** The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern where two of the last three order rates are larger than 95.4% of similar orders rates. Failing this test indicates that this pattern of order rate may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error.	• Increasing order frequency due to normal business variations or order timing. • Item that may have an unusually small variation in order frequency. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity or date entered in for this order may trigger this test.
Test 15	**Four or Five points greater than 1 SD from mean** The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern where four of the last five orders have been more frequent than 68.3% of similar orders. Failing this test indicates that this pattern of order rate may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error.	• Increasing order sizes or frequency of orders due to normal business variations or order timing. • Item that may have an unusually small variation in order rates. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity entered in for this order may trigger this test.
Test 16	**Fifteen points in a row within 1 SD above mean** The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern where the last fifteen orders are slightly larger than average quantity of similar orders. Failing this test indicates that this pattern of order rate may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error	• Item that may have an unusually small variation in order rates. Failure of this test may indicate only a small change due to previous steady order patterns. • Error in quantity or date entered in for this order may trigger this test.
Test 17	**Eight points in a row greater than 1 SD above mean** The rate this customer is ordering product has been identified by the software as potentially suspicious. Rate is determined based on the quantities ordered	• Item that may have an unusually small variation in order rates. Failure of this test may indicate only a small change due to previous steady order patterns.

PUBLIX-MDLT8-00071326

P-01361_7

P-PUB-0225

	and the time between orders for similar products. Frequent low quantity orders may result in higher rates than larger less frequent order quantities. This test is designed to look for suspicious patterns that may not be apparent by looking only at order quantities. The most recent order completes a pattern where the last eight order rates are larger than 68.3% of similar orders. Failing this test indicates that this pattern of order rates may be suspicious compared to historic order amounts. Triggering this test indicates there is a potential that this order rate is suspicious. However triggering this test does not conclusively prove the order is suspicious. Other special causes may have triggered this test in error.	• Error in quantity or date entered in for this order may trigger this test.

PUBLIX-MDLT8-00071327

P-01361_8